

PROPOSED PRELIMINARY SCHEDULING ORDER

Pending a ruling on Plaintiff's Motion Expedited Conditional Certification and Judicially-Supervised Notice Under Section 216(b), the parties propose that the Court issue the following scheduling order:

IT IS ORDERED THAT:

1. Unless the Court has stayed or dismissed the case in the interim, no later than the date that is the later of thirty (30) days after (1) the close of the class Notice Period, in the event the Court grants Plaintiff's Motion for Expedited Conditional Certification and Judicially-Supervised Notice Under Section 216(b) or (2) the Court's denial of Plaintiff's Motion for Expedited Conditional Certification and Judicially-Supervised Notice Under Section 216(b), the parties shall submit a proposed scheduling order that provides proposals for the following deadlines:

- a) to file all amended or supplemental pleadings and to join additional parties (paragraph 1 of the Court's form scheduling order);
- b) to file designations of potential witnesses, testifying experts, and proposed exhibits and to serve on the other party the materials required by Federal Rule of Civil Procedure 26(a)(2)(B) (paragraph 2 of the Court's form scheduling order);
- c) to provide written offers of settlement and responses (paragraph 3 of the Court's form scheduling order);
- d) to provide a report on alternative dispute resolution (paragraph 4 of the Court's form scheduling order);
- e) to object to the reliability of an expert's proposed testimony (paragraph 5 of the Court's form scheduling order);
- f) to complete discovery (paragraph 6 of the Court's form scheduling order); and

g) to file dispositive motions (paragraph 7 of the Court's form scheduling order).

SIGNED this _____ day of _____, 2018.

LEE YEAKEL
UNITED STATES DISTRICT JUDGE

AGREED:

/s/Daniel A. Verrett
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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that on August 17th, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing in accordance with the Federal Rules of Civil Procedure to the following counsel representing the defendants in this action:

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/s/ Daniel A. Verrett

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